

Derek W. Loeser (admitted *pro hac vice*)
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com

Lesley E. Weaver (SBN 191305)
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com

Plaintiffs' Co-Lead Counsel

[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**DECLARATION OF MATTHEW S.
MELAMED IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF PLAINTIFFS' NOTICE
OF MOTION, MOTION, AND
MEMORANDUM IN SUPPORT OF
MOTION FOR SANCTIONS**

Judge: Hon. Vince Chhabria and
Hon. Jacqueline Scott Corley
Courtroom: 4, 17th Floor

I, Matthew S. Melamed, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am a Partner at Bleichmar Fonti & Auld LLP, a member in good standing of the bar of the State of California and of this Court, and counsel to Plaintiffs in the above-captioned action.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. This declaration is made in support of the Plaintiffs' Administrative Motion to Temporarily File Under Seal Plaintiffs' Notice of Motion, Motion, and Memorandum in Support of Motion for Sanctions, the Joint Declaration of Derek Loeser and Lesley E. Weaver in Support of Motion for Sanctions, and Exhibits 1 to 55 thereto.

4. True and correct copies of the following documents are attached as follows:

- (1) Attached hereto as **Exhibit 1** is a true and correct copy of the unredacted version of the Plaintiffs' Notice of Motion, Motion, and Memorandum in Support of Motion for Sanctions. Because this document is temporarily sealed in its entirety, a redacted version has not been provided.
- (2) Attached hereto **Exhibit 2** is a true and correct copy of the unredacted version of the Joint Declaration of Derek W. Loeser and Lesley E. Weaver in Support of Plaintiffs' Notice of Motion, Motion, and Memorandum in Support of Motion for Sanctions, and Exhibits 1-68 thereto. Because these documents are temporarily sealed in their entirety a redacted version has not been provided.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 11th day of March 2022, in Oakland, California.

Dated: March 11, 2022

By: /s/ Matthew S. Melamed
Matthew S. Melamed